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December 3, 2003

VIA FACSIMILE
Michael B. Ganson
36 E. 7th Street
Suite 1540
Cincinnati, OH 45202

Re: Ronald Melton, et al. vs. Board of County Commissioners of Hamilton County, et al.

Dear Michael:

I write in response to your facsimile cover sheet of November 18, 2003 and your missive of November 12, 2003 regarding your clients' outstanding discovery responses in the above-referenced matter.

Plaintiffs were served with the subject discovery requests on November 6, 2002. Please note that the foregoing sentence does not contain a typo. Indeed, your office has had more than one year to comply with Defendants' discovery responses. As such, it is difficult to believe that your office actually has been working to obtain the requested information and medical releases. Although we have obtained some information from some of the Plaintiffs, we have received absolutely nothing from Chester Melton, Clayton Melton and Glenna Royce, all of whom still are asserting claims in this case.

It is my understanding from you that Ms. Royce has passed away since the filing of this lawsuit, but we have received no documentation to that effect; nor have we received word as to whether her purported claims will be pursued by the estate. If her claims still will be pursued, we must receive responses to the discovery requests. As for Chester Melton and Clayton Melton, it is my understanding that you never have even spoken to them about this case much less their responses to discovery. I would imagine that one year would be a sufficient amount of time in which to locate your clients and obtain discovery responses.

Pursuant to your request, I have (again) enclosed HIPAA compliant medical authorization forms for the following:

1. Debbie McCullom – Creative Mental Health;

2. Terry Melton – Dr. Griffen; and

EXHIBIT
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3. Ronald Melton – Steven Katkin and William Miller, M.D.

Although we have received executed authorizations from Sue Goodman and Brenda Martin, those authorizations did not contain the addresses for the Core Behavior and Central Clinic and, therefore, were incomplete. Please forward the complete information to me.

Please contact me upon receipt of this letter so that we may discuss when the requested information will be provided. Should I not hear from you or Mr. Kapor in the next few days, I will have no choice but to file a motion to compel. In light of the fast approaching discovery deadline, we simply cannot rely upon the general assurances contained in your correspondence regarding your efforts to obtain the information. We must be provided with the dates upon which the information will be provided.

In addition to the above, you know we have been waiting to schedule Plaintiffs' respective depositions until such time as we have received sufficient discovery responses. In an effort to avoid any scheduling conflicts over the next two months, please provide me with dates upon which *each of the Plaintiffs* will be made available for deposition.

Your prompt attention to this matter is appreciated.

Sincerely,

KEATING, MUETHING & KLEKAMP, P.L.L.

By: [signature]
Jamie M. Ramsey

cc: Louis F. Gilligan, Esq.
Stephen J. Patsfall, Esq.
David W. Kapor, Esq.
Glenn V. Whitaker, Esq.
Larry E. Barbiere, Esq.